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FILED IN THE U.S. DISTRICT COURT
EASTERN DISTRICT OF WASHINGTON

MAY 13 2025

SEAN F. MCAVOY, CLERK
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YAKIMA, WASHINGTON

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF WASHINGTON

UNITED STATES OF AMERICA,

Plaintiff,

v.

PRESTON KEITH FUNDERBURGH,

Defendant.

1:25-CR-2056-SAB

INDICTMENT

Vio: 18 U.S.C. § 1343

Wire Fraud

(Counts 1 - 4)

18 U.S.C. § 641

Theft of Government Money

(Count 5)

18 U.S.C. § 981(a)(1)(C),

28 U.S.C. § 2461(c)

Forfeiture Allegations

The Grand Jury charges:

Introduction and Background

1. During all times relevant and material to the Indictment, the Social Security Administration (SSA) was an agency of the United States, responsible for

1 administering, among other things, programs commonly known as Title II benefit
2 programs. These included Old-Age, Survivors, and Disability Insurance. The
3
4 Survivors Insurance Benefits (SIB) program pays monthly cash benefits to eligible
5 dependants of deceased workers.

6
7 2. SSA appoints a “representative payee” when a beneficiary is a minor
8 or otherwise incapable of managing his or her Social Security benefits.

9 Representative Payees are individuals or organizations primarily responsible for
10 receiving and spending monthly SIB payments to meet a beneficiary’s needs.

11 Other responsibilities of a representative payee include reporting any
12
13 circumstances in a beneficiary’s life that may affect benefit payments.
14

15 3. Defendant PRESTON KEITH FUNDERBURGH applied for SIB on
16
17 behalf of Minor 1, a child born in May 2020, following the November 20, 2022,
18 death of Minor 1’s mother and FUNDERBURGH’s intimate partner, Amanda
19 Bedard. At the time of his mother’s death, Minor 1 was under the care, custody,
20 and control of FUNDERBURGH and lived with FUNDERBURGH in Selah,
21 Washington, located in the Eastern District of Washington.
22

23
24 4. Given the age of Minor 1 when he became eligible for SIB, the SSA
25 appointed FUNDERBURGH Minor 1’s representative payee. As such,
26 FUNDERBURGH was tasked to both receive and use the monthly SIB benefits for
27 the care of Minor 1.
28

1 5. All designated representative payees, to include FUNDERBURGH,
2 are obligated, among other things, to notify the SSA if a beneficiary dies, leaves
3 the representative payee's custody and/or control, changes living arrangements, or
4 is no longer the representative payee's responsibility.
5

6 6. From on or about April 2023, through on or about April 2025,
7 monthly SIB payments earmarked for Minor 1 were direct deposited by the SSA
8 into Bank of America (BOA) checking account ending in 6912.
9
10

11 7. During all times relevant and material to the Indictment SIB benefits
12 issued by the SSA for the benefit of Minor 1 were distributed in the following
13 manner. Each monthly payment file originated from SSA in Baltimore, Maryland.
14 The payment file was then transmitted to the United States Treasury in Boulder
15 Colorado. From there, the payment file went to Treasury National Payment Center
16 of Excellence in Kansas City, Missouri. The payment file then went to the Federal
17 Reserve Bank in East Rutherford, New Jersey, where it was then transmitted to
18 Bank of America account ending in 6912.
19
20
21

22 Scheme to Commit Wire Fraud
23

24 8. The Grand Jury re-alleges and incorporates by reference Paragraphs 1
25 through 7 as if fully set forth herein. Further, the allegations in all other counts in
26 the Indictment are re-alleged and incorporated as if fully set forth.
27
28

9. Beginning in or about December 2024, and continuing through in or about April 2025, the Defendant, FUNDERBURGH, in the Eastern District of Washington and elsewhere, devised and participated in a scheme to defraud the SSA of SIB by knowingly concealing and failing to report the death of Minor 1, for whom FUNDERBURGH was the representative payee. As a representative payee, FUNDERBURGH was responsible for receiving and managing monthly SIB payments to be used for the care of Minor 1, and in concealing and/or not reporting the death of Minor 1, FUNDERBURGH thereby allowed himself to fraudulently collect Minor 1's monthly SIB payments after Minor 1's death so that he could retain said benefits for his own financial use and personal gain.

Execution of the Scheme to Commit Wire Fraud

10. Between on or about December 2020, through on or about April 2025, FUNDERBURGH devised and executed a scheme to defraud the SSA and to continue receiving monthly SIB by means of false and fraudulent pretenses and representations by concealing the death of Minor 1 from SSA.

11. In or about December 2024, and continuing through in or about April 2025, in furtherance of the scheme and artifice to defraud, FUNDERBURGH did not report the December 2024 death of Minor 1 to the SSA, thereby continuing to allow the SSA to deposit monthly SIB payments for the benefit of Minor 1 into a bank account FUNDERBURGH could access.

1 12. In or about April 2025, in furtherance of the scheme and artifice to
2 defraud, FUNDERBURGH maintained Minor 1 was “fine” or words to that effect
3
4 when law enforcement contacted FUNDERBURGH during the execution of a
5 wellness check on Minor 1.
6

7 13. In or about April 2025, in furtherance of the scheme and artifice to
8 defraud, when family members, friends, and law enforcement inquired as to the
9 whereabouts of Minor 1 after December 2024, FUNDERBURGH fraudulently
10 maintained Minor 1 was in the care and custody of his maternal grandmother.
11

12 14. In or about April 2025, in furtherance of the scheme and artifice to
13 defraud, FUNDERBURGH presented a minor who was not Minor 1, namely
14 Minor 2, who bore similarities in age, height, and hair color, to law enforcement
15 conducting a wellness check on Minor 1, to convince law enforcement Minor 1
16 was well and further wellness checks were unnecessary.
17
18

19
20 COUNTS 1 – 4
21 Wire Fraud

22 15. The Grand Jury re-alleges and incorporates by reference Paragraphs 1
23 through 14 as if fully set forth herein. Further, the allegations in all other counts in
24 the Indictment are re-alleged and incorporated in this count as if fully set forth.
25

26 16. From on or about December 2024, through on or about April, 2025, in
27 the Eastern District of Washington and elsewhere, the Defendant, PRESTON
28 KEITH FUNDERBURGH, with the intent to defraud, devised and intended to

1 devise a scheme to defraud the SSA, and to obtain money by means of materially
 2 false and fraudulent pretenses, representations, and promises for his own personal
 3 gain and, in attempting to do so, caused to be transported by means of wire
 4 communication in interstate commerce the signals and sounds associated with four
 5 separate monthly payments of \$1,119.00 in SIB intended to be used for the benefit
 6 of Minor 1, each monthly wire transfer constituting a separate count of this
 7 Indictment, and each a separately charged violation of 18 U.S.C. § 1343.

Count	Date	Amount	Interstate Wire
1	On or about 01/08/2025	\$1,119.00	Survivor's Benefits for Minor 1 deposited into Bank of America account ending in 6912
2	On or about 02/12/2025	\$1,119.00	Survivor's Benefits for Minor 1 deposited into Bank of America account ending in 6912
3	On or about 03/12/2025	\$1,119.00	Survivor's Benefits for Minor 1 deposited into Bank of America account ending in 6912
4	On or about 04/09/2025	\$1,119.00	Survivor's Benefits for Minor 1 deposited into Bank of America account ending in 6912

COUNT 5
Theft of Government Money

17. The Grand Jury re-alleges and incorporates by reference Paragraphs 1
 through 14 as if fully set forth herein. Further, the allegations in all other counts in
 the Indictment are re-alleged and incorporated in this count as if fully set forth.

1 18. Between in or about January 2025, and continuing through on or about
2 April 2025, in the Eastern District of Washington and elsewhere, the Defendant,
3 PRESTON KEITH FUNDERBURGH, did embezzle, steal, purloin, and knowingly
4 convert to his use and the use of another, any money of the United States and any
5 department and agency thereof, whose value exceeded \$1,000.00, namely, Social
6 Security Survivor's Insurance Benefits intended for Minor 1, to which he was not
7 entitled, in violation of 18 U.S.C. § 641.
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9

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11 NOTICE OF CRIMINAL FORFEITURE ALLEGATIONS

12 The allegations contained in this Indictment are hereby realleged and
13 incorporated herein by this reference for the purpose of alleging forfeitures.
14

15 Pursuant to 18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c), upon
16 conviction of an offense(s) in violation of 18 U.S.C. § 1343, Wire Fraud and/or in
17 violation of 18 U.S.C. § 641, Theft of Government Money, as alleged in this
18 Indictment, the Defendant, PRESTON KEITH FUNDERBURGH, shall forfeit to
19 the United States of America any property, real or personal, which constitutes or
20 is derived from proceeds traceable to the offense(s). The property to be forfeited
21 includes, but is not limited to:
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23
24

25
26 MONEY JUDGMENT

27 A sum of money in United States currency representing the amount
28 of proceeds obtained as a result of the wire fraud offense(s).

MONEY JUDGMENT

A sum of money in United States currency representing the amount of proceeds obtained as a result of the theft of government money offense.

If any of the property described above, as the result of any act or omission of

Defendant:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty,

the United States shall be entitled to forfeiture of substitute property pursuant to 21 U.S.C. § 853(p), as incorporated by 18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c).

DATED this 13 day of May 2025.

A TRUE BILL

Rich Barker

Richard R. Barker
Acting United States Attorney

CRH

Courtney R. Pratten
Assistant United States Attorney